



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

OCT 1 1997

Elizabeth Birch, Treasurer
Human Rights Campaign Fund
Political Action Committee
1101 14th Street NW, Suite 200
Washington, DC 20005

Identification Number: C00235853

Reference: Amended February Monthly (1/1/97-1/31/97 dated 3/21/97), March Monthly (2/1/97-2/28/97) and April Monthly (3/1/97-3/31/97) Reports

Dear Ms. Birch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule E, supporting Line 24 for Independent Expenditures discloses \$14,232.32 in disbursements (pertinent portion(s) attached). An independent expenditure is defined as a communication which expressly advocates the election or defeat of a clearly identified candidate. However, the purposes of expenditure disclosed on Schedule E do not appear to meet the definition of an independent expenditure. The expenditures may be in-kind contributions, which are defined as goods, services, or property offered free or at less than the usual and normal charge. The term also includes payments made on behalf of, but not directly to, candidates and political committees. If these expenditures are in-kind contributions, they appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best

interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



J.P. Andre, Jr.

Reports Analyst

Reports Analysis Division

SCHEDULE E ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1
 For Line Num: 24

Name of Committee (in Full)		I.D. Number		
Human Rights Campaign 1101 14th Street, NW Suite 200		C00235853		
Full Name, Address, Zip Code of Cash Payee	Purpose of Expenditure	Date	Amount	Name of Fed. Candidate supported or opposed & Office
Equal Communications P.O. Box 1343 Buffalo NY 14240-1342	Utilities	2/11/97	\$2,340.58	SENATOR HELM, JESSE A U.S. Senate Support Oppose
Heather Hoell 1662 Vine Maple Eugene OR 97405	Overhead Office supplies	1/25/97	\$150.00	SENATOR HELM, JESSE A U.S. Senate Support Oppose
Perkins Coie 1301 Third Avenue, 40th Flr. Seattle WA 98101-3099	consulting fee	2/27/97	\$185.00	SENATOR HELM, JESSE A U.S. Senate Support Oppose
Frederick Communications 10271 Green Holly Terrace Silver Spring MD 20903	consulting fee	2/11/97	\$5,454.60	SENATOR HELM, JESSE A U.S. Senate Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
(a) SUBTOTAL of Itemized Independent Expenditures (this page)			\$8,130.16	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ 0.00	
(c) TOTAL Independent Expenditures			\$8,130.16	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature

Date

Subscribed and sworn to before me

this 20th day of April

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My Commission expires:

ROSELINDA O. MOSELEY
 District of Columbia
 My commission expires February 28, 2006

ROSELINDA O. MOSELEY
 NOTARY PUBLIC